

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PIETER VAN DONGEN, Individually and on	:	Civil Action No. 1:11-cv-07320-VSB-JLC
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	LEAD PLAINTIFFS' NOTICE OF MOTION
	:	AND MOTION FOR FINAL APPROVAL OF
	:	SETTLEMENT AND PLAN OF
CNINSURE INC., et al.,	:	DISTRIBUTION OF SETTLEMENT
	:	PROCEEDS, AND AN AWARD OF
Defendants.	:	ATTORNEYS' FEES AND EXPENSES
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PLEASE TAKE NOTICE that upon: (i) the Declarations of Samuel H. Rudman affirmed on May 22, 2014; (ii) the Declaration of Jeff Schram and Linda Schram affirmed on May 21, 2014; (iii) the Settlement Agreement dated March 19, 2014 and the Exhibits annexed thereto; (iv) the Declaration of Carole K. Sylvester affirmed on May 20, 2014; (v) Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Plan of Distribution of Settlement Proceeds; (vi) Lead Counsel's Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses and Award Pursuant to 15 U.S.C. §78u-4(a)(4); (vii) Compendium of Unreported Authorities in Support of Motion for an Award of Attorneys' Fees and Expenses; and (viii) all other proceedings herein, Lead Plaintiffs will move this Court, before the Honorable Vernon S. Broderick, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 518, New York, New York on July 9, 2014, at 2:45 p.m., for entry of orders and judgments pursuant to Rule 23 of the Federal Rules of Civil Procedure (1) finally approving the settlement of the captioned litigation, (2)

approving the Plan of Distribution of settlement proceeds, (3) awarding Lead Counsel attorneys' fees, plus expenses in the litigation, and (4) awarding expenses to Lead Plaintiffs.

DATED: May 22, 2014

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
ROBERT M. ROTHMAN
ERIN W. BOARDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 22, 2014.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: elleng@rgrdlaw.com

Mailing Information for a Case 1:11-cv-07320-VSB

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jeremy Todd Adler**
jeremy.adler@davispolk.com
- **Mario Alba , Jr**
malba@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,drosenfeld@rgrdlaw.com
- **Jeffrey A. Berens**
jeff@dyerberens.com
- **Erin Whitney Boardman**
eboardman@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Marshall Pierce Dees**
mdees@holzerlaw.com
- **Michael Ira Fistel , Jr**
mfistel@holzerlaw.com,cholzer@holzerlaw.com,cyoung@holzerlaw.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **David Brendan Toscano**
david.toscano@dpw.com
- **Brian Stryker Weinstein**
brian.weinstein@dpw.com,david.toscano@davispolk.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)